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April 4, 2011

VIA FACSIMILE

Hon. Andrew J. Peck
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom: 20D
New York, NY 10007-1312
Fax: 212-805-7933

Re: *Wi-LAN Inc. v. LG Electronics, Inc. and LG Electronics U.S.A., Inc.*
Civil Action No. 10 Civ. 432 (LAK) (AJP)

Dear Magistrate Judge Peck:

Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. ("LG" or "Defendants") respectfully request clarification concerning their response to Plaintiff's February 3, 2011 letter to the Court, requesting that the Court strike the declarations of Bernard Lechner and Jeffrey Hamilton, which were attached to LG's Opening Expert Report on Invalidity prepared by Adam Goldberg (the "Goldberg Report").

The Court addressed this issue during a February 10, 2011 status hearing and indicated that it would defer consideration of Plaintiff's challenge to the declarations of Messrs. Hamilton and Lechner until summary judgment. Plaintiff has now formally reasserted its objection through a Motion for Partial Summary Judgment that GI and Digicipher References Do Not Qualify As Prior Art, arguing that the Goldberg Report should be stricken based on the same arguments concerning the allegedly improper Lechner and Hamilton declarations that it raised in the 2/3/11 letter request.

Under the Court's briefing schedule for dispositive motions, a party's response to an opposing party's summary judgment motion is due on April 22, 2011. Accordingly, Defendants respectfully ask the Court to clarify that their response, including a supporting declaration regarding the retention of Lechner and Hamilton, on the issues raised in Plaintiff's 2/3/11 letter request is now due on April 22, 2011, as part of LG's response to Wi-LAN's summary judgment motion on the same issue.

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**OPERATES AS GREENBERG
TRAUIG MAHER LLP
**STRATEGIC ALLIANCE

MEMO ENDORSED

SO ORDERED:

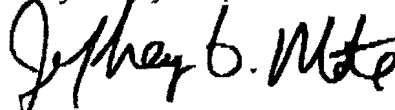
Hon. Andrew Jay Peck
United States Magistrate Judge

GREENBERG TRAUIG, LLP ■ ATTORNEYS AT LAW ■ WWW.GTLAW.COM
77 West Wacker Drive, Suite 3100 ■ Chicago, Illinois ■ Tel 312.456.8400 ■ Fax 312.456.8435
NY 241,072,763v2

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The requested clarification will promote judicial economy by eliminating the need to address the same issue twice: first in connection with Wi-LAN's letter request and then in connection with Wi-LAN's summary judgment motion.

Very truly yours,


Jeffrey G. Mote

ECF TRANSCRIPTION SHEET



**ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

Southern District of New York
United States Courthouse
500 Pearl Street, Room 1370
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933
Telephone No.: (212) 805-0036

Dated: April 4, 2011

Total Number of Pages: 3

TRANSCRIPTION OF MEMO ENDORSED ORDER

Approved.

Copies by ECF to: All Counsel
Judge Lewis A. Kaplan